# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

UNITED STATES OF AMERICA.

Plaintiff.

**COUNT ONE:** 

v.

MICHAEL S. ROJAS, [DOB: 11/11/1974]

Felon in Possession of Firearms /

Ammunition

18 U.S.C. §§ 922(g)(1) and 924(a)(2)

NMT 10 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

Defendant.

#### **COUNT TWO:**

Possession of a Firearm With Obliterated Serial Number

18 U.S.C. §§ 922(k) and 924(a)(1)(B)

NMT 5 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class D Felony

\$100 Mandatory Assessment Per Felony

Count

### **INDICTMENT**

### THE GRAND JURY CHARGES THAT:

### **COUNT ONE**

On or about February 15, 2015, in the Western District of Missouri, the defendant, MICHAEL S. ROJAS, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, firearms and ammunition, to wit: a Taurus, Model Millennium, 9mm caliber handgun, Serial Number TCS14789; a Hi-Point, .40 caliber handgun, with an obliterated serial number; and two (2) live rounds of Remington Arms 9mm caliber ammunition, all of which had been transported in interstate commerce, contrary to the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

## **COUNT TWO**

On or about February 15, 2015, in the Western District of Missouri, the defendant, MICHAEL S. ROJAS, did knowingly possess, a firearm, to wit: a Hi-Point, .40 caliber handgun, which had been shipped or transported in interstate commerce, from which the manufacturer's serial number had been removed, altered, and obliterated, contrary to the provisions of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

A TRUE BILL.

<u>3/6/18</u> /s/ Shannon M. Cassidy
DATE FOREPERSON OF THE GRAND JURY

/s/ Jeffrey Q. McCarther
Jeffrey Q. McCarther
Assistant United States Attorney
Narcotics & Violent Crimes Unit
Western District of Missouri